



U.S. Department of Justice
Civil Division
20 Massachusetts Ave., N.W.
Washington, DC 20530

November 24, 2017

VIA ECF

The Honorable George B. Daniels
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: *Citizens for Responsibility and Ethics in Washington v. Donald J. Trump*,
Civil Action No. 1:17-cv-00458-GBD

Dear Judge Daniels:

We write to inform the Court of a development since the Court heard oral argument on the President's Motion to Dismiss on October 18, 2017.

In the Second Amended Complaint, the hospitality Plaintiffs allege that they will suffer injuries stemming from competition with the Trump SoHo, a hotel in which the President allegedly has a financial interest through the Trump Organization. *See* 2d Am. Compl. ¶¶ 42, 196, 214; *see also* Pls' Opposition to MTD, ECF No. 55 at 19–21. On November 22, 2017, the owner of the Hotel announced an agreement to buy out the remainder of its management and license agreement with the Trump Organization, with the transition expected to take place by year-end. *See* BusinessWire, *Trump Hotels and Condominium Association Announce Management and License Contract Buyout for the Trump SoHo Hotel* (Nov. 22, 2017), <http://www.businesswire.com/news/home/20171122005650/en/Trump-Hotels-Condominium-Association-Announce-Management-License>. This development undermines the hospitality Plaintiffs' reliance on alleged competition with the Trump SoHo to demonstrate standing and is further reason that this Court should dismiss the Second Amended Complaint.

Respectfully submitted

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